

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

REMOTE SOLUTION CO., LTD.,)	
)	
Petitioner,)	
)	
v.)	Civil Action No. 06-004 KAJ
)	
FGH LIQUIDATING CORP. f/k/a)	
CONTEC CORPORATION,)	
)	
Respondent.)	

**RESPONDENT'S RESPONSE TO REMOTE SOLUTION'S
MOTION FOR RECONSIDERATION AND TO AMEND**

It has now been well over three years since Contec filed an arbitration against Remote Solution to enforce a straightforward indemnification provision. Contec was issued a final arbitration award in its favor on December 26, 2005, almost a year ago. Contec's sole goal now is to have that award confirmed as soon as possible so that Contec can finally collect on its award.

Regarding Remote Solution's motion, Contec's position is simply that it be decided as quickly as possible so that Contec can confirm the award. Further proceedings on jurisdictional issues will serve to further delay confirmation.

Contec, therefore, respectfully requests that this Court decide Remote Solution's motion by December 15, 2006, so that, should that motion be denied, Contec will have adequate time to file an application to confirm the arbitration award prior to December 26, 2005, the one year

anniversary of the award. *See* 9 U.S.C. § 9 (stating that an application to confirm an arbitration award may be made “at any time within one year after the award is made”).

Respectfully submitted,

Dated: November 16, 2006

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